

UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF OHIO

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Matthew N. Fitzpatrick, a law enforcement officer with the Drug Enforcement Administration ("DEA"), being duly sworn, deposes and states:

INTRODUCTION

1. I am employed as a Special Agent with the Drug Enforcement Administration ("DEA") Detroit Field Division, Cleveland District Office. I have been employed with DEA for approximately 18 years, becoming a Special Agent in 1999. Prior to Affiant's employment as a DEA Special Agent, Affiant was a licensed attorney practicing in Ohio. As a Special Agent of the DEA, I am an investigative law enforcement officer of the United States of America within the meaning of Title 18, United States Code, Section 2510(7). As such, I am empowered to conduct investigations of and to make arrests for offenses enumerated in Title 18 U.S.C. § 2516.

2. As a Special Agent of the DEA, I have received training at the DEA Academy in Quantico, Virginia. I have received specialized instruction regarding narcotics, narcotics trafficking, money laundering, and various techniques for investigating persons and organizations engaged in this unlawful conduct. I have participated in numerous investigations involving the organized distribution of illegal drugs and have made numerous arrests for drug-related offenses.

3. By virtue of employment as a Special Agent, I have performed and continue to perform various duties, including, but not limited to:

- a. Working in an undercover capacity principally for the purpose of purchasing drug evidence;
- b. Working in the capacity of a surveillance agent detecting and recording movement of persons known to be or suspected of being involved in the illegal drug traffic;
- c. Working as a case agent directing the investigation of various illegal drug traffickers and their organization, directing investigations involving complex conspirators in which numerous drug traffickers located in various states, and foreign countries were working in concert to illegally import, possess and distribute illegal drugs within the United States.

4. As a DEA Special Agent, I have also conducted online investigations, analyzed pen register and telephone toll data, conducted Title III wiretap investigations, analyzed financial records, executed controlled deliveries of controlled substances, interviewed witnesses, drafted and executed search warrants, seized illegal drugs and other evidence of drug violations in physical and electronic sources, processed seized evidence, supervised the purchase of controlled substances by confidential sources, conducted undercover purchases of controlled substances in person and online, and debriefed persons arrested and convicted of drug trafficking offenses regarding their illegal activity.

5. Through investigation and training, I have become familiar with the types and amounts of profits made by drug traffickers and the methods, language, and terms that are used to disguise their illegal activity. I know that persons engaged in drug trafficking require expedient forms of communication to maintain an adequate and consistent supply of drugs from

sources, and to effectively market those drugs to customers. Individuals who buy and/or sell controlled substances on online marketplaces often rely on one or more email addresses as a means to facilitate this expedient communication.

6. Further, I know that wholesale narcotics distributors will frequently use more than one source of supply in order to obtain the lowest price and/or to maintain a steady supply of drugs. Professional drug distributors often provide drugs to associates on credit and receive payment once the drugs are sold, a practice known as “fronting.”

7. Based upon my training and experience, I know that drugs are generally stored and dispersed at varied, and highly secret, locations to avoid seizure and theft. Payment for drugs usually occurs at quickly arranged meetings and at various locations separate from those used to store the drugs. Telephonic and/or online contact is therefore required to coordinate and conduct the ongoing illegal drug transactions. Email communication enables the professional drug dealer to maintain constant contact with associates, drug suppliers, and customers. I know that it is common for drug trafficking organizations (“DTOs”) to use online mediums such as email or Skype to communicate with associates relating to the logistics of their drug trafficking business. I am also aware that DTOs commonly use free email address that may require little or no subscriber information. I also know that those involved in illegal drug operations or other criminal conduct almost always use slang and/or coded language when communicating about drug matters, and frequently subscribe to telephone, email, and Skype Account in the names of others, or in completely false names, in an attempt to conceal their identities and illegal actions.

8. Your Affiant knows based on training and experiences those individuals who traffic in one controlled substances such as U-47700, which is a fentanyl analogue, often traffic

and possesses other controlled substances and controlled substance analogues, such as heroin, bath salts, MDMA, cathinones, and mxe.

9. The information set forth in this affidavit is based upon your Affiant's participation in this investigation, the review of records, as well as upon information provided to your Affiant by other law enforcement personnel. I am familiar with the facts and circumstances of the offenses described in this Affidavit based upon my personal participation in the investigation of the Target Account, as well as through information obtained from other law enforcement agencies, witnesses, and reliable sources. Except as otherwise noted, the information set forth in this Affidavit has been provided to me by agents and/or officers of the Drug Enforcement Administration ("DEA"), United States Postal Service Inspectors ("USPIS"), Homeland Security Investigations ("HSI), or other law enforcement officers. Unless otherwise noted, whenever in this Affidavit I assert that a statement was made, the information was provided by another law enforcement officer (who may have had either direct or hearsay knowledge of the statement) to whom I have spoken or whose report I have read and reviewed. Likewise, any information pertaining to vehicles and/or registrations, personal data on subjects and record checks has been obtained through the Law Enforcement Automated Data System (LEADS), the State of Ohio or the National Crime Information Center (NCIC), the Ohio Law Enforcement Gateway (OHLEG) computer system, and other known database computer systems, by members herein described.

10. Since this affidavit is being submitted for the limited purpose of establishing probable cause, your Affiant has not included each and every fact known concerning this investigation.

11. Your affiant respectfully submits this affidavit in support of a complaint establishing that, from on or about December 20, 2016 to on or about July 21, 2017, BIN WANG has committed violations of federal law, including Title 21, United States Code, Section 841(a)(1), that is, knowingly and intentionally manufacturing, distributing and possessing with the intent to distribute controlled substances and analogues of the same, such as U-47700, 4-CL-PVP, Dibutylone, FUB-AMB, ADB-FUBINACA, and ADB-FUBINACA Title 21, United States Code, Section 843(b), that is, knowingly and intentionally using a communications facility in furtherance of drug trafficking; Title 21, United States Code, Section 846, that is, attempt and conspiracy to possess with intent to distribute and distribute controlled substances and analogues of the same, such as U-47700, 4-CL-PVP, Dibutylone, FUB-AMB, ADB-FUBINACA, and ADB-FUBINACA; Title 21, United States Code, Section 952, that is importation of controlled substances and analogues of the same, such as U-47700, 4-CL-PVP, Dibutylone, FUB-AMB, ADB-FUBINACA, and ADB-FUBINACA; and Title 21, United States Code, Section 545, that is, smuggling goods into the United States.

PROBABLE CAUSE

12. Through the course of a multi-year investigation, DEA has identified GORDON JIN, BING WANG, and others currently known and unknown are members of a multinational conspiracy designed to distribute controlled substances and its analogues into the United States in violation of Title 21, United States Code, Section 841(a)(1), that is, knowingly and intentionally manufacturing, distributing and possessing with the intent to distribute controlled substances and analogues of the same, such as U-47700, 4-CL-PVP, Dibutylone, FUB-AMB,

ADB-FUBINACA, and ADB-FUBINACA Title 21, United States Code, Section 843(b), that is, knowingly and intentionally using a communications facility in furtherance of drug trafficking; Title 21, United States Code, Section 846, that is, attempt and conspiracy to possess with intent to distribute and distribute controlled substances and analogues of the same, such as U-47700, 4-CL-PVP, Dibutylone, FUB-AMB, ADB-FUBINACA, and ADB-FUBINACA; Title 21, United States Code, Section 952, that is importation of controlled substances and analogues of the same, such as U-47700, 4-CL-PVP, Dibutylone, FUB-AMB, ADB-FUBINACA, and ADB-FUBINACA; and Title 21, United States Code, Section 545, that is, smuggling goods into the United States.

13. In particular, your affiant has learned through the course of the investigation that BIN WANG has been operating a lab and/or warehouse in Massachusetts that acts as the chief distribution point for the GORDON JIN DTO in the United States. Law enforcement has intercepted or otherwise obtained emails from GORDON JIN describing his relationship with a Massachusetts coconspirator who is his DTO's distribution center for its clandestine operations in the United States. Law enforcement has intercepted packages and received packages obtained through controlled purchases from the GORDON JIN DTO that contain controlled substances and its analogues (including U-47700, 4-CL-PVP, Dibutylone, FUB-AMB, ADB-FUBINACA, and ADB-FUBINACA), many of which had BIN WANG's name on them. Law enforcement has also personally observed BIN WANG send some of these packages in the mail. Additionally, law enforcement in an undercover capacity has spoken to BIN WANG on the phone. During these conversations, WANG indicated that he had knowledge of GORDON JIN and his organization, that he was aware that drugs such as ADB-FUBINACA were being sent in

the packages WANG was receiving from JIN and then re-distributing in the United States, and that Customs and Border Patrol had intercepted and seized some of these parcels, including an undercover controlled purchase. Finally, on July 21, 2017, Affiant learned that BIN WANG was attempting to flee the country by purchasing a “round trip” flight that very morning to Toronto, Canada, even though the return flight was flying back to the United States on the same day and only a short time after he landed.

14. In November 2015, the DEA Cleveland Resident Office initiated an investigation of individuals suspected of purchasing fentanyl, fentanyl analogues, and other synthetic narcotics from online sources located in China. A continuing epidemic of fentanyl, fentanyl analogues, and synthetic narcotic fatal overdoses led to the identification of numerous Chinese online sources of supply openly selling bulk quantities of fentanyl, fentanyl analogue, and synthetic narcotics for mail delivery to Northeast Ohio drug traffickers. Many of these Chinese web sites utilized the Internet and a myriad of shell companies to mask their activities from United States law enforcement. Subsequent efforts to enlist the direct assistance of Chinese law enforcement have so far been unsuccessful.

19. In April 2016, DEA Agents identified a potential customer of Chinese online narcotic sources. Agents subsequently located and seized a parcel from China addressed to this individual. Following a search of the parcel by Homeland Security Special Agents, DEA Agents seized approximately 100 grams of dibutylone, a synthetic stimulant Schedule I analogue of butylone, commonly referred to as “bath salts.” DEA Agents initiated a controlled delivery operation and delivered the parcel to the individual, who was briefly detained and interviewed. The individual gave Agents a post-Miranda interview, identifying dozens of

Chinese web sites selling kilogram amounts of fentanyl and fentanyl analogues such as acetylfentanyl (aka “ace”), furanylfentanyl (aka “f-uf”) and U-47700 (also known as “pink heroin”). The individual further described the coded language used to order synthetic narcotics online and gave detailed assistance to Agents regarding wire transfers to China, online tracking methods, and ways Chinese companies exploit the United States Postal Service to send narcotics “under the radar” past United States law enforcement via China Post / Hong Kong EMS ‘snail mail’ that does not utilize real-time tracking. Using information learned from the individual, the DEA was able to initiate undercover online activities using undercover devices and Affiant, acting in an undercover capacity, began communicating with various Chinese sources of supply via Skype chat and email accounts through the Chinese and Korean ‘trading site’ www.ec21.com. The individual had identified the www.ec21.com website as one of the most extensive web sites used for Chinese drug trafficking. The individual also identified other “trading” websites that sold synthetic narcotics, and advised Affiant on how to communicate effectively with these web sites and hide Affiant’s law enforcement links online. In August and September 2016, Affiant negotiated and then purchased several ounces of synthetic narcotics from a Chinese online source while in an undercover capacity. The Chinese online source then mailed the narcotics to an undercover post office box as requested by Affiant.

20. During the course of August and September 2016, in response to a rising death toll in Northeast Ohio from hundreds of fentanyl and carfentanil overdoses, undercover agents used their undercover identity to send several purchase inquiries through www.ec21.com, specifically requesting prices and deliveries of carfentanil to Ohio. Carfentanil is a fentanyl analogue that is several times stronger than fentanyl, which is itself several times stronger than

heroin. Carfentanil is legitimately used in zoos as a large animal tranquilizer for large animals such as elephants. Carfentanil is so powerful that only approximately two micrograms is a fatal dose to humans. Several of the online sources replied to Affiant's solicitations via email and Skype chat with detailed carfentanil price lists, payment and delivery options. At no point did any of the sources warn the undercover agent of the dangers of carfentanil, nor did they refuse to sell the undercover agent carfentanil unless they were "already out of stock." Several of the sources that were "out of stock" offered to sell the undercover agent other lethal fentanyl-based analogues such as U-47700 as a "replacement." U-47700, also referred to as "pink heroin," is another similarly powerful Schedule I opioid that has caused several fatal overdoses in Northeast Ohio.

21. Several of the online sources that replied to Affiant's inquiries were using Chinese web domains or Chinese email servers and are thus currently beyond the reach of United States Courts and subpoenas. However, some of the responding sources did utilize United States based servers, Internet Service Providers ("ISPs") and email addresses.

22. The website www.goldenrc.com was advertising over 30 controlled substances, including substances such as a-PVP, furanylfentanyl and U-47700. Affiant knows from previous experience that www.goldenrc.com was implicated as a source for fatal fentanyl analogue overdoses in adjacent Summit County, Ohio in 2015.

23. On August 26, 2016, Affiant, acting under an undercover online name and email account, submitted an inquiry through the website www.ec21.com, requesting a reliable supplier of "RC" known in the online trades as "research chemicals," or synthetic narcotics.

24. In August 2017, Affiant had placed an “inquiry” (purchase solicitation) through the website www.ec21.com, stating the following message: “Looking for a quality, reliable supplier of RC. Have immediate need for replacement items. My associates and I are interested in good purity and discreet shipping.”

25. On August 26, 2017, Affiant’s undercover email address received several responses from various vendors, including the following electronic correspondence:

from GORDON JIN goldenchemical@live.com

to me

John

We are professional research chemicals manufacturer in China, our products are all best quality, a lot of US and European customers purchase largely from us every month. Pls tell me which products you wanna buy?

Regards,

Gordon

www.goldenrc.com

26. Affiant researched the email address using the DEA NADDIS system and found that goldenchemical@live.com had been the contact email for web site www.goldenrc.com, aka Golden United Biotechnology, a website used to purchase acetylfentanyl that caused the overdose deaths of two Summit County residents in 2015. Affiant also found that goldenchemical@live.com was the contact email for the person(s) using screen name “GORDON JIN,”¹ at goldenchemical@live.com, which was used to purchase MDMA (ecstasy) in a Jacksonville, Florida DEA case in 2015.

¹ For ease of reference, Affiant hereafter will refer to the user(s) of the goldenchemical@live.com and sales@globalrc.net, recognizing that the user(s) may in fact have different name(s).

27. Affiant used an undercover computer and visited website www.goldenrc.com, and saw that the website advertised dozens of synthetic narcotics for sale, including lethal opioids U-47700 and furanylfentanyl, the “bath salt” dibutylone (an analogue of Schedule I butylone), FUB-AMB (a synthetic cannabinoid sold as “spice,” linked to dozens of overdoses), 4-CL-PVP (an analogue of Schedule I narcotic a-PVP or “Flakka”) and 25I-NBOH (an analogue of Schedule I psychedelic phenethylamine 2C-I).

28. On November 21, 2016, Affiant wrote to GORDON JIN at goldenchemical@live.com:

to Gordon

We recently settled accounts and parted ways with our former supplier for CAS 59708-52-0 and 3258-84-2 due to purity and reliability issues. We have an urgent need to resume service as quickly as possible. Do you have CAS 59708-52-0, 3258-84-2 or even 121348-98-9 in stock? Please let us know.

29. Affiant was inquiring about Chemical Abstracts Service (CAS) numbers 59708-52-0 (Carfentanil), 3258-84-2 (Acetylfentanyl) and 121348-98-9 (U-47700). Affiant is aware from previous online conversations that online traffickers often use the CAS number to avoid directly asking for illegal or analogue substances, so as to avoid detection by law enforcement keyword searches.

30. On November 21, 2016, Affiant received the following reply from GORDON JIN, using goldenchemical@live.com:

to me

59708-52-0 is carfentanyl, if we synthesize it for you, how many quantity you will buy? 3258-84-2 is acetylfentanyl, it's banned in China, we don't offer it. 121348-98-9 is U-47700, we can offer it, how many quantity you wanna buy?

Regards,

Gordon

www.goldenrc.com

31. On November 29, 2016, Affiant and MEDWAY investigators wrote to GORDON

JIN at goldenchemical@live.com:

to Gordon

Gordon,

Associates would [sic] like a small amount of product before we proceed with a larger order, do we may be certain of future sales.

What would be the total price (including shipping) for 10g 59708-52-0?

How do you accept payment?

Who do I send the payment to?

How do you ship the product and how is it packaged? (discretion is a must)

Do you guarantee delivery, or re-ship if package does not deliver?

Please let me know as soon as possible. We may be able to make this purchase happen tomorrow or the next day.

32. On November 30, 2016, Affiant received the following reply from GORDON

JIN, using goldenchemical@live.com:

to me

I'm sorry, if you only buy 10g 59708-52-0, we will not synthesize it for you, cos quantity is too small, if we synthesize it for you, we will suffer deficit.

We have 121348-98-9(U-47700) in stock, are you interested it?

Regards,

Gordon

www.goldenrc.com

33. On November 30, 2016, Affiant and MEDWAY investigators wrote to GORDON JIN at goldenchemical@live.com:

to Gordon

How much for 50g U47700 (include shipping)

34. On December 1, 2016, Affiant received the following reply from GORDON JIN, using goldenchemical@live.com:

to me

50g U-47700 is \$500 USD, when will you order? How do you pay?

Regards,

Gordon

www.goldenrc.com

35. On December 1, 2016, Affiant and MEDWAY investigators wrote to GORDON JIN at goldenchemical@live.com:

How about 25g for \$250 usd?

We can pay Buy Western Union or MoneyGram.

What is the name and location I am sending the money to? And what is the final price including shipping, for 25g to Ohio, USA?

36. On December 1, 2016, Affiant received the following reply from GORDON JIN, using goldenchemical@live.com:

to me

25g you wanna buy is sample or formal order?

Regards,

Gordon

www.goldenrc.com

37. On December 2, 2016, Affiant received the following reply from GORDON JIN, using goldenchemical@live.com:

to me

If you want sample, 2g is enough to test. If formal order, minimum formal order quantity is 50grams.

25g is sample or formal order? Can you pay by Bitcoin?

Regards,

Gordon

www.goldenrc.com

38. On December 6, 2016, Affiant and MEDWAY investigators wrote to GORDON JIN at goldenchemical@live.com:

to Gordon

Ok, how much for 2 grams? Who do I send it to?

39. On December 7, 2016, Affiant received the following reply from GORDON JIN, using goldenchemical@live.com:

to me

Cost of 2g sample of U-47700 is \$80, do you pay by Bitcoin or money gram?

Regards,

Gordon

www.goldenrc.com

40. On December 7, 2016, Affiant and MEDWAY investigators wrote to GORDON JIN at goldenchemical@live.com:

to Gordon

We can do MoneyGram. Who do we send the moneygram to, and where?

41. On December 7, 2016, Affiant received the following reply from GORDON JIN, using goldenchemical@live.com:

to me

Our money gram information are below:

First name: Guanghua

Last name: Zheng

Country: China

Pls tell me number, 100% right sender's name (first name, last name), amount and country after you transfer money.

Pls also tell me 100% right and detailed address, recipient name and telephone number for shipping.

Regards,

Gordon

www.goldenrc.com

42. MEDWAY related to Affiant that per instructions from goldenchemical@live.com, he had sent \$80.00 USD via MoneyGram to the DTO.

43. On December 8, 2016, Affiant and MEDWAY investigators wrote to GORDON JIN at goldenchemical@live.com, stating, "Please ship the 2g sample of u47700 to the following address," providing the undercover account's name and address, and "Please send me an EMS tracking number when you ship, so we may retrieve it promptly."

44. On December 8, 2016, Affiant received the following reply from GORDON JIN, using goldenchemical@live.com:

to me

OK, we will ship it a.s.a.p

Regards,

Gordon

www.goldenrc.com

45. On December 9, 2016, Affiant and MEDWAY investigators wrote to GORDON JIN at goldenchemical@live.com:

to Gordon

Have you received payment?

46. On December 10, 2016, Affiant received the following reply from GORDON JIN, using goldenchemical@live.com:

We will go to take money and ship on Monday. We can not take USD at weekend according to China government's rule.

Regards,

Gordon

www.goldenrc.com

47. On December 13, 2016, Affiant received the following reply from GORDON JIN, using goldenchemical@live.com:

to me

My friend, pls give us a telephone number for shipping, we will ship by Fedex

Regards,

Gordon

www.goldenrc.com

48. On December 13, 2016, Affiant and MEDWAY investigators wrote to GORDON JIN at goldenchemical@live.com, providing the undercover account phone number to Jin.

49. On December 14, 2016, Affiant and MEDWAY investigators wrote to GORDON JIN at goldenchemical@live.com:

to Gordon

Did you receive my telephone number?

50. On December 16, 2016, Affiant and MEDWAY investigators wrote to GORDON JIN at goldenchemical@live.com:

to Gordon

Tracking number, please?

51. On December 17, 2016, Affiant received the following reply from GORDON JIN, using goldenchemical@live.com:

to me

We ship package to warehouse in USA at first, then ship to you by FedEx, track number is 777976991899.

Regards,

Gordon

www.goldenrc.com

52. Based on this email and the evidence explained below in this affidavit, Affiant believes that the “warehouse” is a “laboratory” run by BIN WANG in Massachusetts used to send illegal drugs in the mail.

53. On December 20, 2016, Affiant received the following reply from GORDON JIN, using goldenchemical@live.com:

to me

I know you have already received sample, everything OK? Is the package opened by customs or name card or paper notice put inside package?

Regards,

Gordon

www.goldenrc.com

54. Affiant believes that GORDON JIN was becoming concerned that the package had been intercepted by law enforcement, and further believes that GORDON JIN was well aware that the substances he was sending were illegal in the United States.

55. On December 20, 2016, MEDWAY Task Force Officer (TFO) Patricia Bintliff picked up a FedEx priority overnight package # 7779 7699 1899 from an undercover box in Summit County, Ohio. This box was shipped from Benjamin WANG, c/o Cambridge Chemicals, 5 Walnut Hill Park, Unit 13, Woburn, Massachusetts, 01801. The telephone number 617-935-2742 was listed on the shipping label. Affiant subsequently issued a subpoena to FedEx for the shipping details of the package.

56. When TFO Bintliff opened the package with MEDWAY Agents, they observed a cardboard box contained within the outer box, labeled www.cambridgechemicals.com; located inside this box was a sealed foil envelope package inside a number of Styrofoam packing "peanuts." Due to the potentially dangerous nature of the narcotics, TFO Bintliff did not open the foil package. MEDWAY agents sent the items to the Ohio BCI&I laboratory for testing and forensic analysis. Subsequently, Affiant received a BCI&I lab report that confirmed that this package contained U-47700, a Schedule I opioid.

57. On December 20, 2016, Affiant and MEDWAY investigators wrote to GORDON JIN at goldenchemical@live.com:

to Gordon

No. We're OK. It wasn't opened by anyone; the girl we sent to pick it up took her time.

58. On December 21, 2016, Affiant received the following reply from GORDON JIN, using goldenchemical@live.com:

to me

When will you have a formal order?

Regards,

Gordon

www.goldenrc.com

59. On December 21, 2016, Affiant and MEDWAY investigators wrote to GORDON JIN at goldenchemical@live.com:

to Gordon

It will take a few days. It is holiday here, one of my associates is out of town.

60. On December 31, 2016, Affiant received the following reply from GORDON JIN, using goldenchemical@live.com:

to me

My friend, we can offer U-47700 now, do you also wanna buy U-47700 from us?

Regards,

Gordon

www.goldenrc.com

61. Affiant noted that this email also included WhatsApp number +8618117528156. Affiant sent a subpoena to WhatsApp for the account information connected to that number, but WhatsApp has not responded to the subpoena.

62. On January 10, 2017, Affiant subsequently issued subpoena # I8-17-246646 to AT&T for phone number 617-935-2742 found on the Cambridge Chemicals shipping label on

the parcel containing U-47700; per AT&T, this number is subscribed to by Yan Zhou, 23 Harvard Street, Winchester, Massachusetts, 01890. AT&T records indicated Zhou is using Yahoo email account CHEMWB@YAHOO.COM, and other telephone number 857-756-7569. Affiant found that telephone number 857-756-7569 is a Google number (an untraceable internet-based phone number that automatically forwards to a second phone).

63. On January 18, 2017, Affiant wrote to GORDON JIN at goldenchemical@live.com:

To Gordon

My associates and I are interested in obtaining more items. Do you have a general list available?

64. On January 18, 2017, Affiant received the following reply from GORDON JIN, using goldenchemical@live.com:

to me

My friend, besides U-47700, during these time our hot sale products are 2-NMC, 4-CEC, Hexen, Ephylone, 4F-PHP, 3-FPM, MPHP, 4-CL-PVP, Dibutylone and 4-methylpentadron, FUB-AMB, ADB-FUBINACA, 5F-MDMB-2201, MMB-CHIMINACA, 5F-ADB, eitzolam and 25I-NBOH. Which products are you interested?

Regards, Gordon

www.goldenrc.com

whats app +86 18117528156.

65. Of the products listed, Affiant is aware that several of the products Jin listed are Schedule I (U-47700) controlled substances or close analogues of Schedule I narcotics, such as 4-methylpentadron, 4-CL-PVP, Hexen, Dibutylone, 4-CEC, ADB-FUBINACA, MMB-CHIMINACA and 5F-ADB.

66. On January 19, 2017, DEA Special Agent Tyler Parkison issued DEA Administrative subpoenas to FedEx and FedEx Ground, requesting records of shipments to and from the address found on the U-47700 package label: 5 Walnut Hill Park, Unit 13B, Woburn, Massachusetts 08101, as well as shipments to Yan Zhou and BIN WANG at their residence located at 23 Harvard Street, Winchester, Massachusetts.

67. FedEx Ground also replied that dozens of packages were delivered to “BIN WANG/Daniel Lab, LLC,” “BIN WANG/Labnetwork, Inc.,” and “Ben WANG/Cambridge Chemicals” were delivered to the 5 Walnut Hill Park, Suite 13 address. Many of these packages were addressed from Chinese chemical companies, tech companies and United States-based chemical companies.

68. Affiant conferred with Customs and Border Patrol (CBP) regarding the international travels of BIN WANG and Yan Zhou. CBP informed Affiant that immigration records checks revealed that WANG had made several entries into the United States for the past 18 months, including several trips to and from China. CBP also informed Affiant that WANG and Yan Zhou travelled together into Canada by vehicle as well.

69. Affiant reviewed Lexis-Nexis commercial databases and found that 5 Walnut Hill Park, Unit 13, Woburn, Massachusetts 1801 is used by BIN WANG, and Yan Zhou, as are as a properties located at 23 Harvard Street, Winchester, Massachusetts, 01890; 271 Cross Street, Winchester, Massachusetts 01890. Neither WANG nor Zhou have a criminal record in the United States.

70. Affiant investigated further and found that the original website for www.cambridgechemicals.com, with URL www.cambridgechem.com appeared to have been

taken down or was not working. A Google cached version of the website listed its location in Boston, Massachusetts with locations in Shanghai and NanJing, China. The site shows a catalog for dozens of legitimate industrial chemicals, as well as links for “custom synthesis.”

71. Affiant examined Google Earth/Google Street maps and found that 23 Harvard Street, Winchester, Massachusetts is a small, two-story frame house; 5 Walnut Hill Park appears to be a small industrial park.

72. Affiant contacted DEA Agents in the DEA Boston office, and requested Massachusetts Driver’s License photos of BIN WANG and Yan Zhou, as well as photographs of 5 Walnut Hill Park, Suite 13, Woburn, Massachusetts and 23 Harvard Street and 271 Cross Street, in Winchester, Massachusetts. 5 Walnut Hill Park photos revealed a multi-unit single story industrial park situated off the main road; no signage was visible in the photographs. The photos for 23 Harvard Street included photographs of a white Mercedes-Benz registered to Yan Zhou at that address.

73. On January 23, 2017, Affiant wrote to GORDON JIN at goldenchemical@live.com:

to Gordon

Do you have CAS 5485-65-4 or a similar replacement?

If so, please send me price quote (including delivery to Ohio) for 50g of CAS 5485-65-4.

Best wishes,

Jack

74. Affiant knows that Chemical Abstract Service (CAS) number 5485-65-4 is a-pvp, or Pyrrolidinopentiophone, commonly known as “flakka,” a powerful Schedule I cathinone linked to dozens of violent psychotic overdose incidents. On January 24, 2017, Affiant received the following reply from GORDON JIN, using goldenchemical@live.com:

to me

Price of 50g 4-CL-PVP (CAS 5485-65-4) is \$240 USD, when will you order? Do you pay by Bitcoin, money gram, bank wire transfer and Western union?

Regards,

Gordon
www.goldenrc.com
whatsapp +86 18117528156

75. On January 25, 2017, at approximately 3 pm, Affiant and Special Agent Tyler Parkison went to the ETN Newsstand located at 1301 East 9th Street, Cleveland, Ohio, 44114, where Affiant wired \$240.00 usd OAF to Lonbao Zhang, China, per instructions from goldenchemical@live.com.

76. On January 25, 2017, Affiant informed JIN that he sent the money to the DTO.

77. On January 27, 2017, United States Magistrate Judge David A. Ruiz, of the Northern District of Ohio signed a federal Search Warrant and Non-Disclosure Order for the contents and data of Microsoft email account goldenchemical@live.com. The Warrant and Order were forwarded to the DEA Investigative Technology Specialist team, who in turn electronically served them on Microsoft, Inc. on January 30, 2017 at approximately 8:40 am EST.

78. On January 31, 2017, pursuant to a silent alert initiated at Affiant's request, BIN WANG was given a secondary inspection by Customs and Border Patrol (CBP) Officers at the San Francisco International Airport. WANG was not alerted to the nature of secondary inspection. During the interview, WANG stated that he is returning from one week business trip to Shanghai, China to find investors for a pharmaceutical logistics business. WANG had one shipment receipt from United States Pharmacopeial for 3 Polyurethane strips. WANG had explained that the polyurethane strips are used for 3-D printing. WANG reported \$300 USD cash. WANG was admitted as a returning Canadian spouse of Yan Zhou. WANG stated that he was laid off about 1 1/2 years ago when the company he worked for was acquired by Merck & Co. WANG is currently in the country on a NAFTA visa as a dependent spouse and is not allowed to have any employment.

79. WANG stated that his US address is 23 Harvard Street, Winchester, Massachusetts, his email address is CHEMWB@YAHOO.COM, and his telephone number is 617-935-2742, the same number listed on the Cambridge Chemicals package sent to MEDWAY investigators on December 20, 2016. No contraband was found in WANG's possession or luggage, nor was any evidence found relating to Cambridge Chemicals. WANG was permitted to resume his travels and released.

80. On February 2, 2017, Affiant wrote to GORDON JIN at goldenchemical@live.com:

to Gordon
Hello! I hope you are enjoying your holidays.
Did you receive the funds I sent?
Just checking...

Jack

81. On February 4, 2017, Affiant received the following reply from GORDON JIN, using goldenchemical@live.com:

to me
We will go take the money on Monday. We will give you track number soon.
Regards,
Gordon
www.goldenrc.com
whatsapp +86 18117528156

82. On February 6, 2017, Affiant received the following reply from GORDON JIN, using goldenchemical@live.com:

to me
My friend, pls give me detailed address, recipient name and telephone number for reshipping.
Regards,
Gordon
www.goldenrc.com
whatsapp +86 18117528156

83. On February 6, 2017, Affiant wrote to GORDON JIN at goldenchemical@live.com, providing the undercover name, address, and telephone number.

84. On February 7, 2017, Affiant received the following reply from GORDON JIN, using goldenchemical@live.com:

To me
Dear Friend,
We will give you track number a.s.a.p.
Regards,
Gordon

www.goldenrc.com
whatsapp +86 18117528156

85. On February 8, 2017, Affiant wrote to GORDON JIN at goldenchemical@live.com:

To Gordon
Is everything ok?

86. On February 9, 2017, Affiant received the following reply from GORDON JIN, using goldenchemical@live.com:

To me
Your package is being sent to USA, we will give you track number after package arrived in USA.
Regards,
Gordon
www.goldenrc.com
whatsapp +86 18117528156

87. On February 14, 2017, at approximately 11:20 PM, Affiant received an email from GORDON JIN at goldenchemical@live.com, notifying Affiant that a FedEx package was en route to Affiant's undercover address. Affiant checked the FedEx tracking for package # 7784 1878 2156, and saw that a package was en route from Woburn, MA to Northfield, Ohio.

88. On February 15, 2017, at approximately 12:30 pm, Affiant and MEDWAY Task Force Officer Patricia Bintliff picked up a packing carton labeled www.cambridgechemicals.com bearing FedEx tracking number 7784 1878 2156, shipped from BIN WANG, Wonda Science, 5 Walnut Hill Park, Unit 13, Woburn, MA 01801 from the undercover DEA UPS box. Affiant and TFO Bintliff transported this exhibit to the DEA

Cleveland District Office, where Affiant field tested it and achieved a positive result for ecstasy/MDMA. This exhibit was sent to the DEA North Central Laboratory and was subsequently confirmed to be 4-CL-a-PVP.

89. Affiant noted that inside the carton was a small ziplock baggie, addressed to Affiant's undercover name and address, containing small blue crystals. The outer FedEx label noted that the package was shipped February 13, 2017 from Wonda Science, from the same address used by Cambridge Chemicals on the previous shipment. Based on Affiant's training and experience, Affiant knows that drug traffickers frequently use fictitious names or change their identifiers or company names frequently to avoid law enforcement detection and interception.

90. Affiant consulted Google search online and found a web site for Wonda Science, with a Chinese HQ address of #701, Tianrun Building C, Changzhou Scientific and Education Park, Changzhou, Jiangsu, 21364, China, telephone number 0086 519 81000586; fax 0086 519 8633 9826; and a US Site listed as 5 Walnut Hill Park, Suite 13, Woburn, MA 01801, telephone number 504-444-2888. Further in the site, it lists Wonda Science's "partners" as ALLICON PHARMA, DANIEL LAB LLC and CAMBRIDGE CHEM. Affiant recognized DANIEL LAB, LLC and CAMBRIDGE CHEM as companies using the 5 Walnut Hill Park location and associated with GORDON JIN and www.goldenrc.com. The Wonda Science web site lists over 5,000 chemicals for sale and offers "custom synthesis."

91. On 3/7/17, Affiant wrote to GORDON JIN at goldenchemical@live.com:

To Gordon

Would you please send me a price quote for a kilogram of 17763-12-1, including shipping to Ohio, USA?

Warmest Regards,

Jack

92. Affiant deliberately requested CAS number 17763-12-1, dibutylone, an analogue of Schedule I ephylone, a synthetic cathinone commonly referred to as “bath salts.”

93. On March 7, 2017, Affiant received the following reply from GORDON JIN, using goldenchemical@live.com:

To me

Jack

17763-12-1 is dibutylone, 1kg is \$1,300 USD including shipping cost to USA, we will reshipe in case package get seized by customs, when will you order? Do you pay by bitcoin, money gram, bank wire or western union this time?

Please send reply to our new email later, it's sales@globalrc.net.

Regards,

Gordon

www.globalrc.net

whatsapp +86 18117528156

94. Affiant queried online open source search engines and found that the website for www.goldenrc.com had been taken down, with only a Chinese character error message in its place, and that a new website, www.globalrc.net was active, listing contact email address goldenchemical@live.com and WhatsApp number +86 18117528156. Affiant believes that this was an attempt to thwart law enforcement by switching traffic to the www.globalrc.net and a non-United States-based email address sales@globalrc.net, which according to open source Whois checks is based in Jiangsu, China.

95. On March 8, 2017, Affiant wrote to GORDON JIN at sales@globalrc.net and cc'd to goldenchemical@live.com:

To Gordon

How much for ½ kilogram of that item?

Why the switch in email? Is there something I should know?

Would be WU again

96. On March 8, 2017, Affiant issued a subpoena to WhatsApp for telephone number +86 18117528156. Affiant has not received a reply from WhatsApp at this time.

97. On March 8, 2017, Affiant received the following reply from GORDON JIN, using goldenchemical@live.com:

To me

500g dibutylone is \$700 USD, our WU information are below:

First name: Songyan

Last name: Ji

Country: China

Pls tell me MTCN, 100% right and detailed address, recipient name and telephone number for shipping.

We changed our email cos new email looks more formal, our websit [sic] is www.globalrc.net

Regards,

Gordon

www.globalrc.net

whatsapp +86 18117528156

98. On March 9, 2017, Affiant wrote to GORDON JIN at sales@globalrc.net:

Is this Gordon?

This is Jack

99. On March 10, 2017, Affiant received the following reply from GORDON JIN, using sales@globalrc.net:

To me

Yes, my friend, may I help you?

Kind regards,

Gordon

www.globalrc.net

whatsapp +86 18117528156

100. On March 14, 2017, Affiant received returned DEA Administrative subpoena # I8-17-436550 information from FedEx regarding parcel number 777976991899, the U-47700 shipped to MEDWAY investigators, which had been shipped by "BIN WANG" from a FedEx drop box serial number 4599650 on 12/16/16. Affiant later learned from FedEx representatives that the FedEx drop box serial number 4599650 is located at 50 Cross Street, Winchester, Massachusetts, 01890. Affiant checked online through Google maps and saw that this FedEx box is located nearly equidistant from BIN WANG's known addresses of 271 Cross Street and 23 Harvard Street, Winchester, Massachusetts.

101. On March 15, 2017, Affiant wrote to GORDON JIN at sales@globalrc.net:

To Gordon

Gordon,

I expect we will remit payment tomorrow via WU.

700 usd for 500g Dibutylone.

Who are we sending it to, and where?

Your friend,

Jack

102. On March 15, 2017, Affiant received the following reply from GORDON JIN, using sales@globalrc.net:

To me

OK, our WU information are below:

First name: Songyan

Last name: Ji

Country: China

Pls tell me MTCN, 100% right and detailed address, recipient name and telephone number for shipping.

Kind regards,

Gordon

www.globalrc.net

whatsapp +86 18117528156

103. On March 16, 2017, at approximately 3:50 pm, Affiant and DEA Special Agent Tyler Parkison went to the ETN Newsstand located at 1301 East 9th Street, Cleveland, Ohio, 44114, where Affiant wired \$700.00 to Songyan Ji, China.

104. On March 16, 2017 Affiant received the following reply from GORDON JIN, using sales@globalrc.net:

To me

Ok, we will go take money and ship a.s.a.p.

105. On March 22, 2017, Affiant wrote to GORDON JIN at sales@globalrc.net, and cc'd his account on goldenchemical@live.com:

To Gordon

Dear Friend,

Please send a tracking number when available, so we may promptly pick up the item.

Regards,

Jack

106. On March 23, 2017, Affiant received the following reply from GORDON JIN, using sales@globalrc.net:

To me

Your package is being sent to USA

Kind regards,

Gordon

www.globalrc.net

WhatsApp: +86 18117528156

107. On March 24, 2017, Affiant received the following reply from GORDON JIN, using sales@globalrc.net:

To me

My friend, fedex track number of 500g dibutylone is 778731044324.

You can operate on fedex website to make package waive signature. If you don't know how to operate, please call to fedex to ask them.

Kind regards,

Gordon

www.globalrc.net

WhatsApp: +86 18117528156

106. On March 31, 2017, Affiant and Task Force Officer Robert Butrey travelled to the UPS Store located at 154 East Aurora Road, Northfield, Ohio 44067, where Affiant retrieved a FedEx

parcel bearing tracking number 7787 3104 4324 from the counter, which was too large to fit inside the undercover UPS box # 117. This parcel was addressed to the same undercover name and address Affiant provided to Jin, and had been sent from "BIN WANG, Wonda Science, 5 Walnut Hill Park, Suite 13, Woburn, MA 01801, US, 508-444-2888."

107. Affiant and TFO Butrey transported the package to the DEA Cleveland District Office, where Affiant photographed the package, the opened it and photographed the contents. Inside the FedEx box, Affiant found a large heat sealed foil envelope, bearing the label, with the undercover name, address, and phone number provided to Jin with "500g" on the line next to that information, above which was written in black marker, the undercover name. When Affiant opened the foil pouch, he smelled a strong chemical odor, and found inside the foil pouch a clear ziplock bag, containing large pink crystals. Affiant performed a NIK field test on shavings from one of the crystals and received a positive indication for MDMA (Ecstasy). Affiant recently received results from the North Central Laboratory that confirmed that package was Dibutylone, an analogue of Schedule I Butylone, commonly known as "bath salts."

108. On March 31, 2017, Affiant wrote to GORDON JIN at goldenchemical@live.com:

To Gordon

Dear Friend,

We received the item today.

Thank you

Warmest Regards,

Jack

109. On April 2, 2017, Affiant received the following reply from GORDON JIN, using goldenchemical@live.com:

To me

Ok my friend

Please send your reply to our new email later, it's sales@globalrc.net

Kind regards,

Gordon

www.globalrc.net

WhatsApp: +86 18117528156

110. On April 18, 2017, Affiant wrote to GORDON JIN at goldenchemical@live.com:

To Gordon

Did you send me another package? There's one in our box and I wanted to know if it was from you before we picked it up. Samples?

Affiant did not get an additional package, but was rather contacting JIN to see how the user(s) would respond.

111. On April 18, 2017, GORDON JIN wrote back to Affiant via goldenchemical@live.com:

To me

My friend, you ordered 500g dibutylone in March, we shipped it to you by Fedex, track number is 778731044324

Please send reply to our new email later, its sales@globalrc.net

Regards,

Gordon

www.globalrc.net

whatsapp; +8618117528156

112. On April 21, 2017, United States Magistrate Judge David A. Ruiz signed a 30-day Cellular GPS Tracking Order for location of AT&T cellular telephone number 617-935-2742, a number known to be used by BIN WANG.

113. Affiant processed this Order through AT&T systems and the first intercept came through on April 21, 2017 at approximately 16:24:26 EST. However, Affiant received responses indicating that the device was not searchable. Affiant subsequently contacted AT&T and was informed that the device was possibly out of the country, as it was not connecting to the AT&T network anywhere inside the United States. Affiant further contacted HSI Special Agent Timothy Stark and was informed that WANG had flown to China and was due back in the United States on April 30, 2017.

114. On April 24, 2017, Affiant emailed GORDON JIN via sales@globalrc.net and copied goldenchemical@live.com:

To Gordon

Any chance you could get us a similar compound?

New product:

5F-AB-FUPPYCA (AZ-037) 2000\$/kg

It's a quote from a competitor.

Kindly let me know. I would rather go with a known, reliable supplier like you.

Warmest Regards,

Jack

115. On April 25, 2017, Affiant received the following reply from GORDON JIN at sales@globalrc.net:

To Jack

My friend, we don't offer 5F-AB-FUPPYCA, But we can offer its analogue, ADB-FUBINACA, AMB-FUBINACA, MMB-CHMCA, 5F-ADB, 5F-MDMB-2201, they all belong to the synthetic cannabinoid, we sell them in big quantity every month, do you wanna have a sample?

Kind Regards,

Gordon

www.globalrc.net

WhatsApp +86 18117528156

Affiant knows from his training and experience that the chemical family of FUBINACA, ADB and AMB synthetics are designer cannabinoid drugs, several of which are either Schedule I controlled substances or analogues of Schedule I controlled substances.

116. On April 25, 2017, Affiant emailed GORDON JIN via sales@globalrc.net and copied goldenchemical@live.com:

To Gordon

Dear Friend,

We are always interested in new business opportunities.

What do you need from us for a sample of your analogue?

Cordially,

Jack

117. On April 25, 2017, Affiant received the following reply from GORDON JIN at sales@globalrc.net:

To me

Jack

We can offer samples, pls tell me how many gram sample of each you wanna buy?

Kind Regards,

Gordon

www.globalrc.net

WhatsApp +86 18117528156

118. On April 30, 2017, Affiant and HSI Special Agent Timothy Stark arranged for BIN WANG to be given a secondary inspection by Customs and Border Protection Inspectors upon WANG's arrival at Boston Logan International Airport on a flight from Shanghai, China. During the course of the inspection, CBP inspectors photocopied several documents in WANG's possession. Examination of these documents showed that while many of the notes were in Chinese language, there were also several entries in English. Affiant forwarded the documents to DEA intelligence analysts for translation but has not received the translations back at this time. Affiant examined the English language notes and found several bank cards

for both United States and Chinese banks; several mixed Chinese and English language notes referencing “Cambridge Chemicals,” “our lab,” “FedEx” “supplies” “solvent” “Huliang WANG,” “Bank Of China,” “SWIFT: BKCHCNBJ940” (believed to be the SWIFT code for the Bank of China branch located in Nanjing, China. SWIFT is bank routing number code, used for transferring money between foreign banks), “Deposit 30/90 net” “Assay Depot” (an online scientific research marketing website). Affiant also noted several business cards, including a business card for Yan Zhou, C.P.A., at Walsh & Co. Accountants, listing telephone number 781-721-0295; business cards for several pharmaceutical and chemical engineering firms located in China; BIN WANG’s Massachusetts driver’s license; and a Delta Airlines Skymiles card in the name of BIN WANG.

119. On May 1, 2017, Affiant emailed GORDON JIN via sales@globalrc.net and copied goldenchemical@live.com:

To Gordon

Dear Friend,

A pleasure to hear from you.

Please send us a price quote for a 50g sample of ADB-FUBINACA including shipping to Ohio, USA.

Warm regards,

Jack

120. On May 1, 2017, Affiant received the following reply from GORDON JIN at sales@globalrc.net:

To me

Jack

Price of 50g ADB-FUBINACA is \$270 USD, do you pay money gram, bitcoin or western union?

Kind Regards,

Gordon

www.globalrc.net

WhatsApp +86 18117528156

121. On May 10, 2017, Affiant received the following reply from GORDON JIN at sales@globalrc.net:

To me

Do you also buy 500g dibutylone at this time? Our western union information are below:

First name: Somgyan

Last name: Ji

Country: China

Please tell me MTCN, 100% right sender's name(first name/last name), amount and country after you transfer money.

Pls also tell me 100% right and detailed address, recipient name and telephone number for shipping.

Kind regards,

Gordon

www.globalrc.net

WhatsApp +86 18117528156

122. On May 11, 2017, Affiant emailed GORDON JIN via sales@globalrc.net and copied goldenchemical@live.com:

Dear Friend,

We are ready to order. We will just get the 50g ADB-FUBINACA sample we had discussed.

Is the \$270 USD price still in effect?

Please let us know

Thank You,

Jack

123. On May 11, 2017, Department of Homeland Security Customs and Border Patrol Inspectors at the FedEx hub located in Indianapolis, Indiana performed a border search on an international FedEx package bearing FedEx parcel # 7277 0965 0632, which was addressed Chemcloud, Inc., 5 Walnut Hill Park, Suite 13, Woburn, Massachusetts 01801. This parcel had been shipped from "Jason Yen," 509-2 Building C, Changzhou, Tianan City, China. CBPO inspectors opened the parcel and discovered approximately 1 kilogram of an off-white powder. Laboratory examination of the contents revealed that it was approximately 1 kilogram of FUB-AMB, an analogue of synthetic cannabinoid AMB-FUBINACA. The package was seized and only after the seizure did Affiant learn of the shipment.

124. On May 11, 2017, Affiant received the following reply from GORDON JIN at sales@globalrc.net:

Yes, in effect. Do you pay by money gram, bitcoin or western union this time?

Kind regards,

Gordon

www.globalrc.net

WhatsApp +86 18117528156

125. On May 15, 2017, Affiant and DEA Special Agent Tyler Parkison travelled to the ETN Newsstand located at 1301 East 9th Street, Cleveland, Ohio, 44114, where Affiant wired \$270.00 usd to Songyan Ji, China, per instructions from GORDON JIN at sales@globalrc.net.

126. On May 15, 2017, Affiant emailed GORDON JIN via sales@globalrc.net and copied goldenchemical@live.com:

Dearest friend,

[...] This is for the 50g sample of ADB-FUBINACA. Please let us know when your representative receives payment.

Warmest regards,

Jack

127. On May 15, 2017, Affiant received the following reply from GORDON JIN at sales@globalrc.net:

My friend, please give me detailed address, recipient name and number for shipping.

Kind regards,

Gordon

www.globalrc.net

WhatsApp +86 18117528156

128. On May 16, 2017, Affiant emailed GORDON JIN via sales@globalrc.net and copied goldenchemical@live.com:

That's good news.

Please ship the unit to:

[undercover address]

Please provide a tracking number when possible.

Best wishes,

Jack

129. On May 17, 2017, DEA Task Force Officer Paul Callahan initiated surveillance of WANG's residence at 23 Harvard Street, Winchester, Massachusetts. TFO Callahan observed Yan Zhou exit the residence, entered her Mercedes and TFO Callahan observed Zhou drive to the Cummins Park FedEx store. This is the same FedEx store location that Affiant had

observed (via recorded video) BIN WANG drop off the 4-CL-PVP that Affiant had purchased. TFO Callahan and a partner photographed Zhou as she brought two FedEx packages into the store, all the while talking on her cell phone. Affiant queried the Precision Tracking of WANG's phone, and found that BIN WANG's cell phone was located at Boston's Logan International Airport. Affiant checked with HSI Special Agent Tim Stark and found that WANG was booked on a flight from Boston Logan International Airport to Chicago, then on to Shanghai that same day. TFO Callahan's partner, standing behind Zhou in line, overheard Zhou mail one small brown box and one larger FedEx box out, with one package going to Canada, and one shipped domestically. Zhou asked the counter clerk several questions regarding shipping the international package, and told the clerk she was shipping them for her husband, who was out of town. Affiant checked the Precision Tracker later and noted that the tracker returned an "unable to locate" message, meaning that the device was no longer on a United States cellular network. Affiant is still awaiting a FedEx subpoena to find out where the boxes were shipped and whether they were shipped via the Wonda Science FedEx account.

130. On May 19, 2017, United States Magistrate Judge David A. Ruiz signed a 30-day renewal of the Cellular GPS Tracking Order for location of AT&T cellular telephone number 617-935-2742, a number known to be used by BIN WANG.

131. On May 22, 2017 United States District Court Judge Donald C. signed a 30-day Title III intercept Order for live interception of Microsoft email account goldenchemical@live.com. Affiant processed this Order through DEA's IMPACT systems and the package and Orders were delivered to Microsoft on May 25, 2017. Live interception began

on June 2, 2017, retroactive to May 26, 2017, at 21:47 hrs., when the first complete email was provided.

132. On May 26, 2017, at approximately 21:45 GMT, the goldenchemical@live.com received an email from "Craig Stinson" using email address CStinson@morrisouth.com:

Re: Dibutylone

Wht (sic) is the best way I usually use western union I need your shipping info

Sent from my iPhone

Due to the sender using the "send and reply" feature on the iPhone they were using, past emails in the chain or "thread" were also captured, including: An email dated May 23, 2017, at 4:08 GMT, GORDON JIN using the goldenchemical@live.com wrote to CStinson@morrisouth.com:

My friend, sorry to reply later. Yes, price is still \$240 USD, do you still pay money gram this time? Please send reply to our new email later, it's sales@globalrc.net.

Regards,

Gordon

www.globalrc.net

whatsapp:+86 18117528156

www.goldenrc.com

CStinson@morrisouth.com.

Affiant believes that “Craig Stinson” using the company email of Morris South, Inc. a CNC manufacturing company with locations in Charlotte, North Carolina and Huntsville, Alabama, is attempting to purchase \$240.00 worth of Dibutylone, an analogue of Schedule I Butylone, from GORDON JIN via the goldenchemical@live.com. Affiant further believes that GORDON JIN is pushing customers to the encrypted ProtonMail account sales@globalrc.net.

133. Affiant queried “Craig Stinson” in open source internet sites and located “Craig Stinson” in Union Hill, Alabama. According to Craig Stinson’s Facebook postings, Craig Stinson is the brother of Randall Stinson, who lists employment on his Facebook page at Morris South metal fabricating shop in Alabama. The Morris South Company email addresses bear the suffixes, “____@morrisouth.com.”

134. On May 29, 2017, at approximately 3:33 GMT, the goldenchemical@live.com received an email from “Krysti Hallett” using email address krystih4@gmail.com:

Hello I had lost my cell n computer but still want to try some if your
products like the 4Fphp

Due to the user utilizing the “send/reply” feature, past emails in the chain or “thread” were also captured, including: An email dated November 20, 2016 at 2:14 GMT, “GORDON JIN,” using goldenchemical@live.com wrote:

2 weeks passed, when will you order sample of 4F PHP?

Regards,

Gordon

www.goldenrc.com

An additional email was including in the thread, from "Krysti Hallett" using email address krystih4@gmail.com:

To GORDON JIN

Re: Sorry I mean the 4fphp

An additional email on October 25, 2016 at 12:14 GMT from "GORDON JIN" using goldenchemical@live.com to krystih4@gmail.com

Sorry, pls transfer money to another western union name, it's below:

First name: Longbao

Last name: Zhang

Country: China

Pls tell me MTCN, 100% right sender's name (first name, last name), amount and country after you transfer money. Pls also tell me 100% right and detailed address, recipient name and

telephone number for shipping.

Regards,

Gordon

www.goldenrc.com

Affiant knows that “Longbao Zhang” is the same name that Affiant, acting in an undercover capacity, wired money to for prior controlled purchases of synthetic narcotics from “GORDON JIN,” and further knows from his training and experience that 4F-php is an analogue of Schedule I a-PVPV, or “flakka,” a powerful synthetic “bath salt” that has been linked to violent and psychotic behavior.

135. Affiant investigated further and found a “Krysti A. Hallett,” 327 Park Street, Rockland, Maine, 0484, with a date of birth of July 11, 1983. DEA Intelligence Analyst Myra Reed ran a deconfliction request through the Ohio High Intensity Drug Trafficking Agency (“HIDTA”) databases, and found a Krysti Hallett under investigation in Maine and Affiant then contacted DEA Agent Harry R. Tideswell III in the Portland, Maine office, who informed Affiant that Krysti Hallett is a subject that has been under investigation for the sale of synthetic cathinones, commonly referred to as ‘bath salts.’

136. On June 5, 2017, Affiant and Task Force Officer (“TFO”) Lori Baker-Stella travelled to the UPS Store located at 154 East Aurora Road, Northfield, Ohio 44067, where the attendant handed Affiant a FedEx package bearing FedEx tracking number 7792 4511 0394. Affiant noted that the return address label read: BIN WANG, WONDA SCIENCE, 5 Walnut Hill Park, Suite 13, Woburn, MA 01801, with telephone number 617-418-3888.

137. Affiant checked the telephone number 617-418-3888 in Google and found listings to 1Chem, a company known to be used by BIN WANG; links to sales@1chem.org, and a website for www.1chem.org, which lists contact information of 5 Walnut Hill Park, Suite 13B Woburn, Massachusetts, 01801, telephone number 617-418-3888. Affiant noted that the website uses similar fonts, coloring and structure as the website for CAMBRIDGE

CHEMICALS. Affiant and TFO Baker-Stella transported the package to the DEA Cleveland District Office, where Affiant, witnessed by TFO Baker-Stella, performed a NIK field test on shavings from the inside baggie and received a positive indication for MDMA (Ecstasy).

Affiant photographed the inside foil pouch, which bore the name "John O'Neil," and "50g," and a label which read: "John O'Neill, [undercover address], 50g." Affiant noted that the handwriting and packaging appeared to be the same as other previously purchased packages, and the 1-kilogram of FUB-AMB synthetic cannabinoid seized by DHS on May 11, 2017 in Indianapolis, Indiana.

138. On June 14, 2017, at approximately 3:07 pm, Affiant, witnessed by TFO Baker-Stella, used an undercover cell phone and a covert recording device to call 617-418-3888, the number for sales@1chem.org and BIN WANG, supplied on the return address label for the 50 grams undercover controlled purchase delivered to Affiant on June 5, 2017. A male voice answered the phone, your Affiant hung up.

139. On June 15, 2017, the Hon. Magistrate Judge David A. Ruiz, of the Northern District of Ohio, signed a 30-day Cellular GPS Tracking Order second renewal for location of AT&T cellular telephone number 617-935-2742, a number known to be used by BIN WANG.

140. Affiant processed this Order through AT&T systems and the intercepts continued. Data was maintained in the attached email account the data was transferred to via AT&T.

141. At the time of the renewal, the cellular telephone used by BIN WANG was located at or very near his residence located at 23 Harvard Street, Winchester, Massachusetts. The cellular telephone travelled to areas of Woburn, Massachusetts, Malden Massachusetts, downtown Boston, and then on to Boston Logan International Airport, where BIN WANG flew

out via Delta Airlines on June 21, 2017, with a final destination of Shanghai, China. Due to an internal error, AT&T did not process the GPS tracks for the period of June 21-28th; however, Affiant has been informed by Homeland Security Investigations Special Agent Timothy Stark that BIN WANG is slated to return to the United States via commercial air on July 14th 2017.

142. On July 5, 2017, Affiant was informed by Homeland Security Investigations Special Agent Timothy Stark that a shipment bound for BIN WANG at 5 Walnut Hill Park, Woburn, Massachusetts 01801 had been seized by United States Customs and Border Patrol inspectors at the Indianapolis, Indiana FedEx hub on May 16, 2017. This was a FedEx parcel bearing tracking number 7791 0327 0912, sent from “Jason Yen”, 509-2 Building C, Changzhou Tianan City, Changzhou, JS 213164, sent to BIN WANG, Chemcloud, Inc., 5 Walnut Hill Park, Suite 13, Woburn, MA 01801, telephone number 617-935-2742 (the TARGET NUMBER). While Affiant only learned of the seizure recently, laboratory analysis confirmed that the substances contained inside were 4'-methyl-alpha-pyrrolidinohexanophenone HCl (aka 4'-methylalpha-PHP, an unscheduled new analogue of Schedule I a-PVP, or “flakka”, a synthetic cathinone), and 4'-fluoro-alpha-pyrrolidinohexanophenone HCl (aka 4'-fluoroalpha-PHP, an unscheduled new analogue of Schedule I a-PVP, or “flakka”, a synthetic cathinone). The customs declaration submitted at the time of shipment by “Jason Yen”, was written on Wonda Science letterhead and had declared the shipment to be an inert chemical that was not either 4'-fluoro-alpha-pyrrolidinohexanophenone or 4'-fluoro-alpha-pyrrolidinohexanophenone. Affiant has received undercover purchases of Schedule I synthetic narcotics and Schedule I analogues from ‘Wonda Science’ on previous occasions.

143. On June 28, 2017, DEA Special Agents and Task Force Officers from the Boston office conducted surveillance on 5 Walnut Hill Park to find a suitable location for a pole camera on the building. Affiant checked the GPS PING and noted that BIN WANG's cellular telephone was out of the AT&T service area (which covers most of the United States), and requested that a DEA undercover Agent enter the premises to see what was inside. A DEA Special Agent, acting in an undercover capacity, entered the 5 Walnut Hill Park facility and made a detailed surveillance of the inside of the building and the facilities before a heavy set Asian male confronted the Agent, who then gave an excuse and left the premises.

144. On June 29, 2017 the Hon. Judge Donald C. Nugent, of the Northern District of Ohio, signed a 30-day Title III intercept renewal Order for additional live interception of Microsoft email account goldenchemical@live.com. Affiant processed this Order through DEA's IMPACT systems and the package and Orders were delivered to Microsoft on July 2, 2017. Live interception began on July 7, 2017, retroactive to July 4, 2017, at 10:08:23 hrs. GMT, when the first complete email was provided.

145. On July 5, 2017, Affiant and DEA Special Agent Tyler Parkison travelled to the Erievue Newsstand located at 1301 East 9th Street, Cleveland, Ohio 44114, for the purpose of sending \$1,900.00 to Guanhua Zheng, the designated recipient of GORDON JIN at goldenchemical@live.com and sales@globalrc.net. Affiant had previously used his undercover email account to negotiate the purchase price of 1 kilogram of ADB-FUBINACA, a Schedule I synthetic cannabinoid, from GORDON JIN via goldenchemical@live.com and sales@globalrc.net.

146. Upon completion of the telephone contact with WU representatives, the clerk refused to wire the money, and told Affiant, "I don't want to get audited...please, go somewhere else." Affiant attempted to convince the clerk to send the funds, but the clerk would not complete the transfer.

147. Affiant and Special Agent Parkison walked across the street to the CVS store located at 1400 East 9th Street, Cleveland, Ohio 44114, to use the MoneyGram kiosk. However, the MoneyGram representative at the kiosk also refused to send the wire transfer.

148. On July 5, 2017, at approximately 4:26 pm, Affiant, acting in an undercover capacity, sent the following message to GORDON JIN at goldenchemical@live.com and also cc'd to sales@globalrc.net :

Dear Friend,
We just tried sending you representative the wire for 1900.00, but both W/U and M/G refused to do the transfer.

We used two different people, so there's no issue over here.
Any ideas?
Your friend,
Jack

149. On July 5, 2017, at approximately 1:44 pm, GORDON JIN replied to Affiant's undercover account via sales@globalrc.net:

Jack
Can you pay by bank wire transfer or bitcoin? Or I give you another name of money gram?
Kind regards,
Gordon
www.globalrc.net
WhatsApp: +86 18117528156

150. On July 6, 2017, at approximately 1:07 am, , Affiant, acting in an undercover capacity, sent the following message to GORDON JIN at sales@globalrc.net, cc'd to goldenchemical@live.com :

Should we send it in pieces?
Or can you give me an account # and bank to send it to?
Jack

151. On July 6, 2017, at approximately 1:45 am, GORDON JIN replied to Affiant's undercover account via sales@globalrc.net :

You can try to divide into several money if transfer money by moneygram.
Pls do not label the money is for buying adb-fubinaca when you transfer money, don't label any chemical name, otherwise I worry the account will be cancelled. I suggest that you label it as tuition fee or Family maintenance when transfer money, our bank informations are below: (bold type by GORDON JIN):

Beneficiary Name: Zheng Guanhua
Bank Name: China Merchants Bank Hong Kong Branch
Account number: 6212998605901756
Swift code: CMBCHKHH
Address: 21/F, Bank of America Tower, 12 Harcourt Road, Central Hong Kong

Pls tell me sender's name after you transfer money
Pls also tell me 100% right and detailed address, recipient name and telephone number for shipping.
Kind Regards,
Gordon
www.globalrc.net
WhatsApp: +86 18117528156

152. On July 6, 2017, at approximately 2:07 pm, Affiant, acting in an undercover capacity, sent the following message to GORDON JIN at goldenchemical@live.com:

Dear Friend,
We just went to a different location and sent you a WU gor [sic] \$1900 usd to:
GUANGHUA ZHENG
CHINA
MTCN: 659-724-8809
Kindly advise when your representative picks this up.

Kindest regards,
Jack

153. On July 9, 2017, at approximately 9:46 am, GORDON JIN replied to Affiant's undercover account via sales@globalrc.net:

Yes, we received the money pls give me detailed address, recipient name and telephone number for shipping.

Kind Regards,

Gordon

www.globalrc.net

WhatsApp: +86 18117528156

154. On July 17, 2017, Affiant, acting in an undercover capacity, placed a consensually recorded telephone call to BIN WANG on BIN WANG's cell phone, 617-935-2742. This is the same cell phone that Affiant been GPS tracking. Affiant spoke to WANG and complained about his missing delivery. On the call, Affiant said that he had obtained WANG's phone number from a prior parcel that WANG sent to "John O'Neill." Affiant mentioned GORDON JIN, his missing order through sales@globalrc.net, and receiving prior deliveries from BIN WANG and WONDA SCIENCE. WANG did not dispute the information and instead took down Affiant's information to look for the missing order. WANG directed Affiant to forward him an email about the missing order to WANG's email, bwang@cambridgechem.com, an email address linked to Cambridge Chemicals, the same company that had shipped Affiant a package of synthetic opioid U-47700 in December, 2016.

155. On July 17, 2017, after speaking with Affiant as "John O'Neill", Boston DEA Agents observed WANG exit 5 Walnut Hill Park in Woburn, Massachusetts and travel to the FedEx store located in Woburn, Massachusetts, the same FedEx facility that WANG had shipped the 4-CL-PVP to Affiant in February, 2017. Agents observed WANG send out three

FedEx packages to two individuals at three addresses in the West Palm Beach, Florida area.

Affiant and Boston DEA Agents called ahead to Florida DEA agents, who subsequently seized the packages and opened them. Upon opening, agents discovered approximately four kilograms of suspected synthetic cathinones, or “bath salts”. Laboratory analysis for these three packages is pending at this time.

156. On July 19, 2017, Affiant saw pursuant to the ping warrant that WANG traveled to midtown Manhattan. As stated earlier, WANG has no lawful employment in the United States due to the limitations on his NAFTA visa. WANG has made other significant purchases in the last few months, such as frequent flights to China.

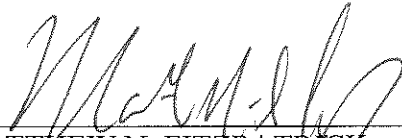
157. Affiant learned on July 17 that the undercover purchase on 1 kilogram of ADB-FUBINACA that Affiant had ordered from GORDON JIN had been seized by CBP inspectors in Indianapolis, Indiana, along with two other large packages of synthetic narcotics, all destined for BIN WANG at the 5 Walnut Hill Park address in Woburn, Massachusetts.

158. On July 20, 2017, Affiant again placed a consensually recorded telephone call to BIN WANG at 617-935-2742 in his undercover capacity as “Jack O’Neill.” On the call, Affiant talked to WANG about his package being seized by Customs, to which WANG replied sarcastically, “Oh...great.” Affiant asked WANG for advice about shipping a replacement package of FUBINACA from GORDON JIN via DHL, and WANG advised Affiant to have the package shipped directly to Affiant directly instead of to WANG. WANG, who is a chemist by trade, in no way indicated surprise when Affiant mentioned the controlled substance. Affiant also mentioned that he had concerns that CBP could intercept and seize the replacement parcel. WANG again did not indicate any surprise, but instead laughed about it.

159. On July 21, 2017, Affiant learned at approximately 9 a.m. that WANG booked a last-minute flight to Toronto, Canada that departs Boston at approximately 12:10 p.m. Eastern time. The flight was technically “round trip,” but the return flight was flying back to the United States on the same day and only a short time after he landed.

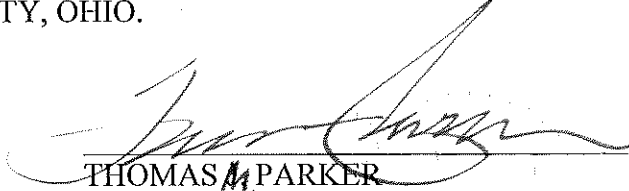
160. Affiant respectfully submits that there is probable cause establishing that GORDON JIN, BING WANG, and others currently known and unknown, are members of a conspiracy designed to distribute controlled substances and its analogues into the United States in violation of Title 21, United States Code, Section 841(a)(1), that is, knowingly and intentionally manufacturing, distributing and possessing with the intent to distribute controlled substances and analogues of the same, such as U-47700, 4-CL-PVP, Dibutylone, FUB-AMB, ADB-FUBINACA, and ADB-FUBINACA Title 21, United States Code, Section 843(b), that is, knowingly and intentionally using a communications facility in furtherance of drug trafficking; Title 21, United States Code, Section 846, that is, attempt and conspiracy to possess with intent to distribute and distribute controlled substances and analogues of the same, such as U-47700, 4-CL-PVP, Dibutylone, FUB-AMB, ADB-FUBINACA, and ADB-FUBINACA; Title 21, United States Code, Section 952, that is importation of controlled substances and analogues of the same, such as U-47700, 4-CL-PVP, Dibutylone, FUB-AMB, ADB-FUBINACA, and ADB-FUBINACA; and Title 21, United States Code, Section 545, that is, smuggling goods into the

United States.



MATTHEW N. FITZPATRICK
Special Agent
Drug Enforcement Administration

SWORN AND SUBSCRIBED TO BEFORE ME THIS 21st DAY OF JULY, 2017, AT
CLEVELAND, CUYAHOGA COUNTY, OHIO.



THOMAS M. PARKER
United States Magistrate Judge